

**EXHIBIT A**

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**FIRST AMENDED STIPULATION AND AGREED SCHEDULING ORDER  
GOVERNING DEBTORS' OBJECTION TO PROOFS OF CLAIM FILED BY TAI  
MO SHAN LIMITED**

This first amended stipulation and agreed scheduling order (the “First Amended Stipulation”) is made and entered into by and among (i) FTX Trading Ltd., Alameda Research Ltd. (“Alameda”), and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), and (ii) Tai Mo Shan Limited (“TMS,” and together with the Debtors, the “Parties”), by and through their respective undersigned counsel. In support of this First Amended Stipulation, the Parties respectfully state as follows:

WHEREAS, on June 28, 2023, TMS filed proof of claim number 5475 against Alameda;

WHEREAS, on May 15, 2024, TMS filed proof of claim number 94967 against Alameda, amending proof of claim number 5475;

WHEREAS, on July 5, 2024, TMS filed proof of claim number 95768 against Alameda, amending proofs of claim numbers 5475 and 94967;

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

WHEREAS, on July 10, 2024, the Debtors filed the *Debtors' Objection to Proofs of Claim Filed By Tai Mo Shan Limited* [D.I. 20030] objecting to proofs of claim numbers 5475 and 94967 and the *Declaration of Steven P. Coverick in Support of Debtors' Objection to Proof of Claim Filed by Tai Mo Shan Limited* [D.I. 20034];

WHEREAS, on August 19, 2024, TMS filed the *Response of Tai Mo Shan Limited to Debtors' Objection to Proofs of Claim Filed By Tai Mo Shan Limited* [D.I. 23341];

WHEREAS, on October 3, 2024, the Parties filed the *Stipulation and Agreed Scheduling Order Governing Debtors' Objection to Proofs of Claim Filed By Tai Mo Shan Limited* [D.I. 26264-1] (the "Stipulation"), and on October 10, 2024, the Court entered the Stipulation and the *Order Approving Stipulation and Agreed Scheduling Order Governing Debtors' Objection to Proofs of Claim Filed By Tai Mo Shan Limited* [D.I. 26456] (the "Scheduling Order");

WHEREAS, on December 23, 2024, the Debtors filed the *Motion of Debtors for Entry of An Order Authorizing the Debtors' Assumption of Certain Agreements* [D.I. 29058];

WHEREAS, paragraph 3 of the Scheduling Order provides that the Stipulation may be modified "by a writing signed by all Parties approved by the Court;" and

WHEREAS, the Parties have conferred and agreed to modify the Scheduling Order to extend certain of the deadlines set forth therein.

**NOW, THEREFORE**, it is hereby stipulated and agreed, and upon approval by the Court it shall be **SO ORDERED**:

1. First Amended Agreed Scheduling Order. The Parties agree to the following scheduling order (the "First Amended Agreed Scheduling Order"):

EVENT	DEADLINE
Completion of fact witness depositions	February 24, 2025

Debtors to submit expert report/rebuttal to TMS's expert report (including workpapers)	March 3, 2025
TMS to submit expert rebuttal report to Debtors (including workpapers)	March 21, 2025
Completion of expert discovery	March 28, 2025
Evidentiary hearing on proofs of claim numbers 5475, 94967, and 95768 filed by TMS	To Be Determined Upon Court's Availability

2. Pending approval of this First Amended Stipulation by the Court, each of the Parties agrees that it is and will be bound by this First Amended Stipulation and waives any right to object to approval by the Court.

3. If approved by the Court, the First Amended Agreed Scheduling Order shall be modified only by a writing signed by all Parties approved by the Court, or otherwise upon entry of an order of the Court entered upon notice to the Parties.

4. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of the First Amended Scheduling Order.

Dated: January 16, 2025  
Wilmington, Delaware

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